

Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Re: Comments on Advanced Notice of Proposal Rulemaking for Part 704

Dear Ms. Rupp,

This is in response to NCUA's Advanced Notice of Proposal Rulemaking and request for comment concerning Corporate Credit Unions. I would like to comment on a few topics:

Payment Systems: Payment systems are very valuable services we receive from our corporate. I do not believe, payment systems only corporates, could provide these services at an affordable price and still generate sufficient income to survive. Corporates should provide both payment system and investment services.

Liquidity: We depend on our corporate to help meet our short-term liquidity needs. We may not use this service on a regular basis, but when we need it, it is readily available.

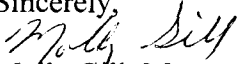
Field of Membership: There should be a defined field of membership, this is a characteristic that defines us as credit unions. We appreciate having a local corporate and the level of service they provide.

Expanded Investment Authority: All corporates should have the same investment authority. The authority should be highly regulated.

Two-Tiered System: This is a question better answered by the corporates.

Corporate Governance: Boards should be volunteer, and each corporate should decide what experience their directors need. I do not believe outside directors or term limits are a good idea. There is no need for access to salary information.

We depend on our corporate, First Carolina, for settlement services, wire transfers, overnight and short term investments. Our corporate also provides us liquidity, education and training. First Carolina has done a wonderful job in providing these services and we would prefer to be able to continue using them as our corporate. I believe local corporates are paramount to the survival of small credit unions. Without local corporates, we risk losing the quality, quantity, and affordability of the services, we receive from our local corporates.

Sincerely,

Molly Gill, Manager
Fayetteville Postal Credit Union